



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 18, 2023

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Peter Khaimov, 22 Cr. 20 (PGG)

Dear Judge Gardephe:

The Government, upon consent of defense counsel, requests a *Curcio* hearing for defendant Peter Khaimov. The Government does not believe that an actual conflict exists. However, prior to representing defendant Khaimov, defense counsel briefly represented cooperating witness Marcelo Quiroga. The Government expects Quiroga to testify at trial. Quiroga did not have any personal interactions with defendant Khaimov, and the Government does not anticipate that Quiroga will testify about defendant Khaimov. Quiroga's testimony instead will focus on the actions of other trial defendants. The Government nonetheless requests a *Curcio* hearing out of an abundance of caution. Counsel for defendant Khaimov is available on August 3, 2023 if the Court has availability.

Thank you for your consideration of this request.

MEMO ENDORSED: A *Curcio* hearing will be held on August 3, 2023 at 2:00 p.m. in Courtroom 705 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York.

Respectfully submitted,
DAMIAN WILLIAMS
United States Attorney

SO ORDERED.

Paul G. Gardephe
United States District Judge

Dated: July 19, 2023

/s/
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